



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2014R01413

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 14, 2019

By Federal Express and ECF

Richard Levitt, Esq.
Levitt & Kaizer
40 Fulton Street, 23rd Floor
New York, New York 10038

Deborah Colson, Esq.
Colson Law PLLC
80 Broad Street, 19th Floor
New York, New York 10004

Re: United States v. Dilshod Khusanov
Criminal Docket No. 17-475 (WFK)

Dear Mr. Levitt and Ms. Colson:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes supplemental discovery in the above-referenced matter, which is being provided pursuant to the Stipulation and Order dated January 10, 2018. This disclosure supplements the government's prior productions of unclassified discovery under cover of letters dated January 10, November 16 and December 17, 2018 and prior productions of classified discovery under cover of letters dated July 27 and November 28, 2018. The government renews its request for reciprocal discovery from the defendant, including disclosure pursuant to Fed. R. Crim. P. 16(b)(1)(C)(i).

The government hereby discloses records related to the defendant from the following entities:

- AT&T (KHUSANOV 001125 – KHUSANOV 001467),
- Bank of America (KHUSANOV 001468 – KHUSANOV 001635),
- Comcast (KHUSANOV 001636 – KHUSANOV 001637),
- JPMorgan Chase Bank (KHUSANOV 001638 – KHUSANOV 001642), and
- WePay, Inc. (KHUSANOV 001643 – KHUSANOV 001657).

The government also discloses surveillance photographs taken on or about July 14, 2015 in the vicinity of 1623 South Michigan Avenue, Villa Park, Illinois, bearing Bates numbers KHUSANOV 001658 – KHUSANOV 001659.

In addition, the government writes pursuant to Fed. R. Crim. P. 16(a)(1)(G) to notify you that the government anticipates calling at trial (a) one or more expert witnesses who are expected to testify regarding the history of the Islamic State of Iraq and al-Sham (“ISIS”) and al-Nusrah Front during the relevant time period outlined in the indictment, including specific acts of terrorism perpetrated by ISIS and al-Nusrah Front, their recruitment of foreign fighters, the mechanics of travel to join ISIS and al-Nusrah Front, and fundraising efforts by and financial contributions to ISIS and al-Nusrah Front; and (b) one or more expert witnesses to testify regarding the translations from foreign languages into English of various documents that have previously been or will be produced in discovery. The identity, qualifications, and bases for the conclusions of each expert will be provided to you when they become available.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Douglas M. Pravda
Douglas M. Pravda
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Enclosures (KHUSANOV 001125 – KHUSANOV 001659)

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)